

Seattle Commission for People with disAbilities

Response and Positions on Proposed Changes to the Use of Disabled Parking Placards Proposed by the Seattle Department of Transportation and the Seattle Police Department

Submitted to:

Seattle Department of Transportation
Seattle Police Department
Seattle Office for Civil Rights
Senator Ed Murray
Senator Sharon Nelson

January 28, 2011
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Seattle Commission for People with disAbilities

Report on Proposed Changes for the Use of Disabled Parking Placards

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Seattle Commission for People with disAbilities

Report on Proposed Changes for the Use of Disabled Parking Placards

Executive Summary

The Seattle Department of Transportation (SDOT) and the Parking Enforcement Section of the Seattle Police Department (SPD) contacted the Seattle Commission for People with disAbilities (SCPWD) for input on changes the departments propose to manage on-street parking for short-term users including those with disabled parking placards. The City was concerned with metered parking turnover and revenue loss resulting from disabled parking placard abuse.¹

SDOT proposed the following changes:

- Impose a 4-hour time limit for vehicles with disabled parking placards in parts of downtown and First Hill.²
- Increase fines
- Create progressive fines for repeat offenders
- Strengthen the placard replacement standards
- Reinforce and change physician requirements and standards to issue placards

SCPWD Process for Considering Proposed Changes

Over a five-month period, representatives from SCPWD, SDOT, and SPD met in person twice and had several phone and email exchanges. SCPWD sought input from a variety of community-based organizations and Seattle residents who would be directly impacted by changes to the use of disabled parking placards, including³:

- National Multiple Sclerosis Society - Greater Northwest Chapter
- Paralyzed Veterans of America - Northwest Chapter
- Governor's Committee on Employment and Disability Issues
- Northwest ADA Center
- Washington State Department of Services for the Blind
- Women Wheelers of Washington
- Seattle residents who use parking placards
- Seattle University student researching disability parking placard abuse

SCPWD Position on SDOT Proposals

The Commission generally agrees with SDOT that there is parking placard abuse and that this abuse causes lack of parking space turnover and loss of revenue to the City.

We do not agree that limiting parking to 4 hours for people using disability parking placards will address the abuse issue. It is the opinion of the Commission, as noted in the list of supports and recommendations following this summary, that:

- Enforcement, public education, and stronger issuance policies would more directly impact the abuse.
- A four-hour parking limit would adversely impact the majority of legitimate placard users.
- Changing RCW and SMC statutes from unlimited parking to the four-hour limit does not address the concern of parking placard abuse.

¹ Attachment A: power point presentation from SDOT

² SDOT has since revised its proposal to no longer include First Hill in the pilot program.

³ See Attachments B – E: MS letter, research paper, Seattle Times article, resident comments

Commission Positions and Recommendations

Commission Position on SDOT Proposals

- ✓ Oppose 4-hour parking limit citywide
- ✓ Support increased fines for placard abuse
- ✓ Support progressive fines for repeat offenders
- ✓ Support some changes to placard replacement standards
- ✓ Support some changes in physician requirements

Commission Recommendations for SDOT

In addition to the SDOT proposals that the Commission supports, we recommend the following:

Enforcement

Increased Officer Enforcement

- All parking enforcement officers should have the ability to verify placards and ticket abusers.
- Embed each placard with an electronic (RFID) chip or barcode for identification.
- Tow vehicles that display a placard registered to an individual who is deceased.

ADA Enforcement – Title III

- Provide the mandatory number of designated accessible parking spaces per block.
- Reinforce the obligation of private parking garages to provide compliant, accessible parking and accessible routes.

Volunteer Enforcement

- Train and utilize a volunteer task force.
- Establish a hotline to report suspected abuse.

Public Education

- Use electronic message signs to alert drivers entering high abuse areas about increased enforcement of disabled parking placards and fines.
- Post signage about increased fines for abuse of disabled parking placards.
- Alert businesses with high employee abuse to educate their staff and volunteers about proper use of placards.

Policy/Legislative Changes at State Level

Department of Licensing

- Change renewal time from 5 years to 3 years
- Renew in person only in order to verify identification
- Add a data field for the name of the issuing doctor to the current database of individuals with placards
- Require the incident number of a police report to replace lost or stolen placards

Department of Social and Health Services

- Modify the application form submitted by doctors to be more prescriptive in order to substantiate the need for a parking placard.
- Develop a more readily available database of doctors who authorize placards to enable law enforcement to monitor and track abuse and over-prescribing.
- Narrow the list of medical professionals/paraprofessionals who can authorize disabled parking placards.

SCPWD position on SPD proposals to State and City legislation (Attachment F)

- ✓ Support - Change RCW 46.16.381(7) from “parking” to “traffic”
- ✓ Oppose - Change RCW 46.61.582 from “unlimited period” to “4 hours”
- ✓ Oppose - Change SMC 11.72.065 from “unlimited parking” to “4 hours”
- ✓ Oppose - Change SMC 11.23.380 from “unlimited parking” to “4 hours”
 - Support add language for “2nd and 3rd offense”
 - Support add “for the first offense”
- ✓ Support - Add to SMC 11.72.440 “2nd offense \$500, etc...3rd offense \$1000, etc...”
 - RCW 46.16.381/SMC 11.23.380/SMC 11.72.065

Discussion of Proposed Pilot Areas for 4-Hour Time Limit (Attachment G)

SDOT proposed to test the 4-hour time limit in three pilot areas in First Hill and Downtown, including the city blocks around Swedish and Virginia Mason Medical Centers and the Civic Center between Madison and Yesler and 3rd and 6th Avenues. These are the areas identified with the highest incidence of placard abuse.

The parking areas around hospitals and medical facilities can expect to have a higher use of disabled parking placards due to both temporary and chronic health conditions that contribute to a disabling condition. While the Commission acknowledges these are areas of high abuse, we find that it would be an undue hardship for patients who legitimately use disabled parking placards. We have heard from numerous stakeholders who have multiple medical appointments, tests, and procedures that require them to park for more than four hours. The City should not place an undue burden on residents using the placards legally.⁴

Conclusion

The Commission supports the efforts of SDOT and SPD to reduce the abuse of disabled parking placards and create more parking space turnover. The Commission feels strongly that the solution to placard abuse should not adversely impact the majority of legitimate placard users. The Commission will continue to provide community input on these issues and share these concerns with the varied disability communities impacted by SDOT policies.

⁴ Although SDOT has revised its proposal to no longer include First Hill, the Commission maintains its position opposing the four-hour limit because its rationale for opposing the restriction applies with equal force in downtown Seattle.

Seattle Commission for People with disAbilities

Report on Proposed Changes for the Use of Disabled Parking Placards

Full Report

Background on Parking Placard Abuse

In meetings with the City, the Commission has learned that over the past 20 years, SDOT and SPD have been monitoring the problem of disabled parking placard abuse. In 1984, 80 - 85% of placards were used illegally. Enforcement efforts have reduced the abuse, but in the highest incident areas, the misuse of placards remains high. SPD reports that in targeted trouble areas such as the Civic Center and First Hill, 40% of paid parking spaces are full most of the day with vehicles displaying disabled placards. Of those, 60% are reported as being misused. Ten percent are inactive; other common abuses include using placards that belong to a family member or friend when they are not in the vehicle, or using the placard of someone who is deceased.

Approximately 30 – 40 infractions are issued per month. Few of these are challenged and most are upheld in court. In 2009, the City increased fines for illegal use of a disabled parking placard to \$250. It increased again in 2010 to \$550. Yet, even though the fines have more than doubled, SPD reports that the number of abuse incidents has actually increased. In the research report by Layla Bush (Attachment C) she references several possible explanations; (1) the fine still costs less than a month of paid parking in private garages; (2) low enforcement decreases threatened sanctions; (3) fines often are reduced or totally dismissed in court.

A high majority of offenders are the employees of Swedish, Virginia Mason and Bank of America, directly observed by the investigative officer of the disabled parking task force of SPD. Education outreach targeting hospital employees through the staff newsletter dropped abuse by half, but only for about a month.

Statistics show that there are approximately 757,000 inactive placards in circulation statewide. In 2009, the Seattle Times printed an article discussing the problem of placard abuse. The article elicited comments from residents – disabled and non-disabled – who mostly prefer that the City target perpetrators rather than oppose limits on legal placard users (see Attachment E).

After gathering input from community stakeholders, the Commission generally agrees with SDOT that there is parking placard abuse and that this abuse causes lack of parking space turnover and loss of revenue to the City.

We do not agree that limiting parking to 4 hours for people using disability parking placards will address the abuse issue. The Commission, as noted in the list of supports and recommendations following this summary, is of the opinion that:

- Enforcement, public education, and stronger issuance policies would more directly impact the abuse.
- A 4-hour parking limit would adversely impact the majority of legitimate placard users.
- Changing RCW and SMC statutes from unlimited parking to the 4-hour limit does not address the SDOT stated concern of parking placard abuse.

Following a discussion of the SDOT proposals, the Commission offers a set of recommendations to reduce abuse of disabled placards and increase turnover of parking spaces.

Discussion of SDOT Proposals

Four-hour parking limit: OPPOSE

The Commission was not convinced that limiting the parking time for people with disabled parking placards would in fact discourage or impact the number of people who are using the placards illegally. We agree that a number of people are using the placards improperly. These illegal users have stolen placards, are using a deceased family member's placard, or have purchased placards illegally, etc. Limiting parking to 4 hours would not address this abuse in any way.

Increased fines for placard abuse: SUPPORT

The Commission believes that increased fines, including the possibility of having a violator's car impounded, would in fact deter illegal use of disabled parking placards. The Commission supports the increased enforcement of existing regulations and ever increasing fines. We understand and empathize with SPD that there are currently limited resources to increase the enforcement of parking placard abusers. The Commission supports the change of RCW 46.16.381 (7) so an illegal parking placard infraction would become a traffic infraction. Along with equipment and training enhancements, this would allow more of the Seattle parking patrols to enforce the parking placard regulations. Increased revenue from enforcement fines would help offset additional costs of this enforcement strategy.

Progressive fines for repeat offenders: SUPPORT

This support follows the same justification for creating stronger deterrent strategies through more aggressive enforcement.

Change placard replacement standards: SUPPORT

The Commission would like to see more accountability from DOL to control unlimited replacements and negligence in record-keeping that allows placards to be issued when in fact they need to be removed from the system because the owner is deceased. The Commission also proposes changes to the administration of the parking placards including:

- Limiting permanent disability placard issuance to every three years
- Renewing in person only
- Limiting replacements to a reasonable number (such as three, but not unlimited)
- Creating an appeals process if the replacement number is reached
- Requiring a filed police report on lost or stolen placards in order to receive a replacement

The Commission does not support any lengthy or costly process for legitimate placard users to renew or replace a lost or stolen placard. This includes opposition to mandatory doctor visits at residents' cost, for renewal or replacement. It is important that DOL provide the maximum amount of respect and dignity by not forcing permanently disabled persons to continue to prove their disability. Many people with disabilities would find this insulting.

Change physician requirements: SUPPORT

The Commission supports revisions to the placard authorization form that can assist physicians in being more diligent in their prescription of disabled parking placards. The Commission also supports enforcing penalties on physicians that are abusing the issuance of placards. SPD acknowledges that many physicians distribute parking placards for reasons that may not comply with state criteria. Physicians should be made aware of the over-distribution problem and should be tracked by DOL by adding a data field for the issuing physician's name. SPD has stated over-issuance as a known problem, but tracking physicians currently requires an officer to investigate files in person in Olympia. By tracking through a database that is accessible to parking enforcement, if there is over issuance or abuse, DOL has the opportunity to audit or investigate to ensure the physician is in compliance with regulations.

Commission Recommendations

The Commission recommends that the City take steps to curb abuse of placards including, but not necessarily limited to, increased enforcement by officers and volunteers, targeted public outreach, and support for policy changes at the State level. The Commission's recommendations are as follows.

Increased Enforcement

The Commission believes that increased enforcement and higher penalties aimed at placard abusers is the best approach to reversing the abuse. The Commission understands the limited resources (budget/manpower) currently available to enforce laws regarding placards. The Commission understands that current enforcement efforts are limited by a combination of the following:

- FTE – 1 full time parking officer
- Inability for other officers to verify parking placards
- Time constraints (waiting for drivers to return to vehicles to confirm legal registration)
- Budget resources

Our recommendations are targeted to help increase these resources as well curb abuse. We suggest specific steps aimed at increased officer enforcement, ADA enforcement, and volunteer enforcement efforts.

Officer Enforcement

- **Enable all parking enforcement officers to verify placards and ticket abusers.**

With more officers able to confirm the valid use of a parking placard, more violators can be ticketed and more deterrent applied. Per our conversations with SPD, only a designated few parking enforcement officers have the ability to use a Blackberry to verify the ID number on a placard to get the registration information. Issuing Blackberry devices that can access the state database to all parking patrol officers would allow identification and ticketing of more violators

will certainly be identified and ticketed. The increased revenue from fines will provide needed resources.

- **Embed each placard with an electronic (RFID) chip or barcode for identification.**

With a chip or bar code, officers can read information on the spot with a device or smart phone app, increasing their capacity to ticket, confirm ownership, and tow if necessary.

- **Tow vehicles that display a placard registered to an individual who is deceased.**

There can be no misunderstanding regarding the use of a placard registered to a person who is deceased. The car should be impounded. SPD reports that finding placards being actively used but registered to a person who is deceased is one of the top methods of abuse. Public knowledge will act as a deterrent and also curb repeat offenders. Placards can be confiscated at this point.

ADA Enforcement – Title III

- **Provide the mandatory number of designated accessible parking spaces per block.**

The City should be in compliance with the ADA. Section R216 “On-Street Parking” of the Draft Guidelines for Accessible Public Rights-of-Way establishes the Minimum Required Number of Accessible Parking Spaces per Total Number of Marked or Metered Parking Spaces on the Block Perimeter. These Draft Guidelines are the currently recommended best practices, and can be considered the state of the practice that should be followed for areas not fully addressed by the present ADA Accessibility Guidelines (ADAAG) standards. Additional designated parking spaces on the street for accessible parking would assist in turnover as well as clarity on potential violators. This would also mitigate possible civil action against the City.

- **Reinforce the obligation of private parking garages to provide compliant, accessible parking and accessible routes.**

This recommendation arises from SDOT’s proposal to limit placard use to 4-hours around two hospitals in the First Hill area where abuse is high. The Commission has heard from several residents that the parking garages in the area do not offer accessible parking spaces and routes, so that legitimate placard users are forced to use short-term, metered space for long-term hospital procedures or doctor’s appointments. Accessible parking spaces are safer for individuals with disabilities because they provide room to deploy mobility devices safely rather than in traffic.

Volunteer Enforcement

- **Train and utilize a volunteer task force.** (See attachment C)

Cities in at least twenty states are using volunteer parking enforcement. RCW 46.16.381 allows volunteers at least 21 years old to issue citations.

- **Establish a hotline to report suspected abuse.**

Using volunteers would increase the number of people patrolling for violators. There may be some risks, however, to this approach. A toll-free number could be easily and safely be used by volunteers or the public to report violators of accessible parking spaces or people illegally using disabled parking placards. This should assist in increased ticketing of violators.

Public Education

A public education campaign is an essential complement to the enforcement efforts outlined above. Components of the education campaign might include:

- **Use electronic message signs to alert drivers entering high abuse areas about increased enforcement of disabled parking placards and fines**

Easy and cost-effective messaging would advise people that illegal use of disabled parking placards is a violation, is being monitored, and will be heavily prosecuted.

- **Post signage about increased fines for abuse of disabled parking placards.**

Signage informing people of the fine structure and aggressive enforcement would act as an awareness tool around the City as well as a reminder of the cost of violation.

- **Ask businesses with high employee abuse to educate their staff and volunteers about proper use of placards.**

Per SPD, a high frequency of abuse is occurring near certain businesses and hospitals in the First Hill area, where employees are misusing disabled placards to park all day for work. Officers have witnessed the strategies of employees to try and hide the abuse, such as re-parking their vehicle to decrease visibility. The Commission believes that the City should appeal to businesses to be accountable for their employees and help educate them about the need for accessible spaces for patients, the threat of fines, and the possible repercussions in employee work evaluations.

Policy/Legislation Changes at State Level

The Commission recommends policy changes at the state level, involving the Department of Licensing and the Department of Social and Health Services.

Department of Licensing

- **Change renewal time from 5 years to 3 years**

Washington has one of the longest renewal periods (see Attachment C, p. 15) Reducing the amount of time between renewals helps ensure that placards are indeed going to the people they are registered to and not ending up in the wrong hands. Currently someone could have an active placard for 5 years that is not registered to them and unless the owner reports it lost or stolen it will remain active.

- **Renew in person only in order to verify identification.**

Requiring renewals in person confirms identity and ensures that placards are issued to the correct individual. This is **NOT** a method to confirm disability.

- **Require the incident number of a police report to replace lost or stolen placards.**

Currently, an unlimited number of replacement placards can be issued. This has contributed to the excessive amount of placards in distribution. The Commission supports the SPD's recommendations to file a police report in order to apply for a replacement placard and to limit replacements to a reasonable number (such as three or four). We recommend creating an appeals process if the replacement limit is reached.

- **Add a data field for the name of the issuing doctor in the current database of individuals with placards.**

The Commission believes physicians need to be more accountable for issuing disabled parking placards. To increase responsibility and to shift attention onto physicians and their issuing criteria, tracking the correlation between high replacement of placards and a specific physician would assist DOL and SPD in monitoring placard and physician abuse. This also provides the ability for DOL to develop an audit tool for annual reviews.

Department of Social and Health Services

- **Modify the application form submitted by doctors to be more prescriptive in order to substantiate the need for a parking placard.**

There are many complaints about the ease of obtaining a disabled parking placard. The Commission wants DSHS to enforce quality standards to emphasize the importance of the established criteria for authorizing receipt of a disabled parking placard.

- **Develop a more readily available database of doctors who authorize placards to enable law enforcement to monitor and track abuse and over-prescribing.**

SPD has described the challenge of investigating placard abuse when records are kept in and can only be accessed in Olympia at the State building.

- **Narrow the list of medical professionals/paraprofessionals who can authorize disabled parking placards.**

The Commission recommends a review of the current list of professionals and paraprofessionals who can authorize disabled parking placards. This type of review might identify areas of potential abuse.

Conclusion

The Commission supports the efforts of SDOT and SPD to reduce the abuse of disabled parking placards and create more parking space turnover.

Other states across the country have struggled with the same abuse issues and have proposed many of the same solutions recommended by the Commission. Connecticut has proposed enforcement sweeps and volunteer task forces; Massachusetts has proposed a hotline; and Kentucky has proposed database tracking of doctors, holograms on placards, increased fines and public education (see Attachment C, p. 8 – 9).

Given the geography of the downtown and First Hill areas, with the numerous hills and older streets and structures, residents with disabilities often face many challenges navigating the City. The Commission is concerned that limiting the parking time to 4 hours will not allow enough flexibility and freedom.

The Commission is also concerned about the pilot project spreading into residential areas, where it would pose even greater parking challenges for residents with disabilities.

The Seattle Commission for People with disAbilities feels strongly that the solution to placard abuse should not adversely impact the majority of legitimate placard users. The Commission will continue to provide community input on these issues and share these concerns with the varied disability communities impacted by SDOT policies.

Seattle Commission for People with disAbilities

Report on Proposed Changes for the Use of Disabled Parking Placards

(slide 1) Disabled Parking in Seattle

August 5, 2010

Seattle Commission for People with Disabilities

Mary Catherine Snyder, Allison Schwartz, Mike Estey SDOT

William Edwards, Jane Hell SPD Parking Enforcement

(slide 2) Meeting purpose & agenda

- Purpose: develop shared understanding of problems/issues and start moving toward solutions
- Agenda
 - Presentation
 - Q & A, discussion
 - Next steps

(slide 3) Why and how we manage parking

It's a scarce resource!

Economic & neighborhood vitality

Environmental goals

Equity

Curbspace priorities

1. Transit
2. Passenger and commercial loading
3. Short-term customer parking
4. Parking for shared vehicles (carshare)
5. Vehicular capacity

(slide 4) Parking with a placard or plate in Seattle

Allowed

- Valid out of state disabled parking plates and permits
- Free parking at on-street paid parking meters and pay station kiosk
- Unlimited parking at paid and time-limited street parking

- Unlimited parking in Restricted Parking Zones (RPZs) without an RPZ permit

Not Allowed

- Use of loading zones (load/unload and passenger load zones) past time allowed
- Parking in No Parking or No Stopping areas
- Parking in peak period restricted areas (e.g., No Stopping 3pm – 6pm)
- Parking in car-sharing and carpool parking zones

(slide 5) The problem – placard abuse

40% of civic center and First Hill paid spaces full most of the day with placard vehicles

(slide 6) Parking enforcement tools

- \$250 ticket for using invalid placard
- Disabled parking taskforce

(slide 7) State role

- Disabled parking laws are governed by WA State Department of Licensing (DoL)
- State law enables cities to put 4-hour time limits in place

(slide 8) Proposed changes to state law

- Increase fines
- Create progressive fines for repeat offenders
- Strengthen placard replacement standards
- Reinforce physician requirements

(slide 9) How can we improve access?

- 4-hour time limit
- More loading areas
- Disabled parking spaces
- Other ideas?

(slide 10) Next steps

- Continue conversation about city changes
- Opportunities to engage in state proposals



January 26, 2011

To Whom It May Concern:

As the Seattle Department of Transportation considers revisions to its disabled parking policy, we ask that you consider the perspective of the National Multiple Sclerosis Society. We understand your desire to free up additional parking in certain neighborhoods, but we are concerned that you will place a significant burden on the multiple sclerosis (MS) and disability community if you place limitations on disabled parking.

MS is a chronic, often disabling disease that attacks the central nervous system. Symptoms may be mild, such as numbness in the limbs, or severe, such as paralysis or loss of vision. The progress, severity, and specific symptoms of MS are unpredictable and vary from one person to another. Fatigue is one of the most common symptoms of MS, occurring in about 80% of people who live with MS. Fatigue can significantly interfere with a person's ability to function at home and at work, and may be the most prominent symptom in a person who otherwise has minimal activity limitations.

Washington has one of the highest incidences of MS in the country and at least 1,266 Seattle residents live with MS. To inform our position, we asked our members for input. Many individuals felt that a four hour time limit was too short to complete a routine medical appointment and would punish those who need extra assistance to get to their destination. A medical appointment for someone who lives with MS can easily exceed four hours as it may include an MRI, a visit to the pharmacy and a lengthy examination with a neurologist. Further, loss of balance and fatigue makes walking long distances extremely difficult for many people who live with MS.

The National MS Society does not support a four hour time limit for disabled parking in Downtown and First Hill. We instead encourage reforms to crack down on the abuse of disabled placards. In evaluating abuse, we encourage safeguards to protect the MS community, especially those who suffer from fatigue and other invisible symptoms.

We appreciate your consideration of our perspective and we look forward to working with you as you evaluate options to improve Seattle's disabled parking policy. For further information, please contact me at jim.freeburg@nmss.org or (206) 284-4254 x40237

Jim Freeburg
Advocacy Director
National Multiple Sclerosis Society, Greater Northwest Chapter

Attachment C
Student Research Paper

Disability Parking Enforcement in the City of Seattle

Layla Bush

Seattle University

10/11/2010

December 7, 2010

SCPWD Representative: _____

Michael Bisesi: _____

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Executive Summary

Seattle, like many other areas of the country, has been having significant issues with placard abuse, particularly in certain high-traffic areas. This abuse has three major consequences: reduction of city revenue, less frequent turnover of parking spaces and reduced availability of parking for those with disabilities (all described in more detail on pg. 6). Given that the disabled population is likely to increase as our population grows older and stays alive longer, it is crucial for Seattle to implement and test methods of decreasing abuse of disability parking placards.

This paper focuses on five options that seem most viable and effective for Seattle. These include: 4 hour parking, education program including enforcement sweeps, increase in fines and making it harder for fines to be dismissed, improving databases and technology for enforcement, and doing nothing (Pgs 10-16 for details of each alternative). The criteria used to evaluate the alternatives are: the efficacy of the alternative in catching violations and improving parking turnover, the cost of implementing and supporting the alternative, and whether or not the option is equitable to someone with a disability.

There are also three ideas that were considered only briefly because they were either straightforward, had obvious flaws, or were beyond the scope of the paper. The first was changing the wording of the RCW 46.16.387 (7), so that unauthorized use of a disabled placard is considered to be a traffic infraction. This will allow Parking Enforcement Officers to confiscate the illegal placard when they issue a ticket. This change was directly suggested by Officer Jane Hell, who leads the Seattle parking task force that is responsible for dealing with disabled placard abuse. The second alternative that will not be considered is having those with disabilities pay for parking. Even though Seattle's new electronic meters are ADA accessible (SDOT, n.d.), it is likely that this measure is too extreme and will result in a negative backlash from the disabled community. Finally, Seattle could work with the state to change the way that placards are issued and renewed, such as more frequent renewal, or renewal in person so that abuse would become less likely. This will not be considered as it requires State level changes.

This paper is intended to be a baseline for discussion, and as such, no direct recommendations are made. An effectiveness matrix showing the comparison of the listed alternatives against the criteria of evaluation can be found on page 33.

Introduction

The City of Seattle is currently struggling with the challenge of effectively enforcing the laws regarding disabled placards. This involves both catching and penalizing those who abuse placards, while at the same time ensuring that the rights of those with actual disabilities are not reduced. This issue has become increasingly important as it has been found in surveys of the First Hill neighborhood of Seattle that about 40% of those using street parking were using a handicapped placard, several of which were found to belong to the deceased (Seattle Department of Transportation [SDOT], 2009). Since parking with a placard allows free, eight hour parking, it is suspected that many of those using the placards are doing so in violation of the law. This type of violation reduces turnover of parking spots in high traffic Seattle neighborhoods which takes spots from those who need them as well as reduces parking revenue for the city. Trying to find a solution to the problem of disabled parking abuse is important to both the City of Seattle as well as those disabled individuals who live, work, and visit Seattle. The purpose of this research paper is to provide alternative options and ideas that can be used as a starting place for discussion of the issue within the Seattle Commission for People with Disabilities (SCPWD), who advise the Seattle City Council.

Current Laws Regarding Disabled Parking

Under the Americans with Disabilities Act (ADA) Title III, places of public accommodation (businesses) must remove barriers which may prevent people with disabilities from accessing their services. The state of Washington and City of Seattle's penalties and fines for violating the ADA's law on disability parking can be found at RCW 46.16.381, SMC 11.23.400 and SMC 11.72.065. Essentially these codes define who is qualified to use a handicapped placard, and create a monetary penalty of two

hundred fifty dollars for a first violation of disability parking laws, with up to 40 hours of community service for a second offense. The court may not suspend more than half of any fine given for violation of these laws.

Why a Change in Laws is Crucial

According to the U.S. Census, in 2008 there were 41.3 million people with some level of disability, which is about 15% of the total population (U.S. Census). To put this number in perspective, Hispanics, which make up the largest cultural minority group in the U.S. are only about 13.3% of the population. For those with disability, approximately 72% rely on private automobiles for transportation (U.S. Census). It is safe to assume that many of those who drive themselves and have a disability are also eligible for a disability placard. In addition, given that between 2000 and 2030 the estimated number of Americans over 65 will more than double (from 35 million to over 71 million), and the fact that 41% of people over age 65 have a disability, we are likely to see an explosion in the use of placards (U.S. Census). This makes figuring out effective ways to prevent abuse of disability placards a vital concern for many local police departments and the communities they serve.

The current budget woes of the city and state add to the importance and significance of finding a better, less expensive way to enforce disability parking, especially if increased enforcement can lead to higher ticketing revenues. Jane Hell, who leads the parking enforcement task force that targets those who abuse disability parking, advised me that Seattle loses significant revenue due to abuse of placards. Specifically, Jane told me that in Seattle “one vehicle occupying a space ... costs the city approximately \$4,000/year or \$20,000/5yrs” (personal communication, November 10, 2010). This cost dramatically increases when you consider that, on average, there are “a minimum of three vehicles displaying placards on a city block” which raises the cost to “\$12,000/year or \$60,000/yrs” (Jane Hell, personal communication, November 10, 2010). This number can soar in high abuse areas. Since the rate of abusers vs. non-abusers is about 60% to 40%, it can be easy to see that the city is losing out on a significant revenue source when people use a disability placard to park for free (Jane Hell, personal

communication, November 10, 2010; Tierney, 2002). So, overall it can be estimated that Seattle loses at least \$7,200 (assuming 60% of cars parked with a placard are doing so illegally, multiplied by the yearly cost of \$12,000 per city block) per city block per year to disability parking abuse. Given that there are hundreds of city blocks in the downtown and First Hill areas, this loss is probably quite significant.

Literature Review

Understanding abuse of disabled placards is a complicated issue where there are many assumptions and few available facts. One of the only specific research studies on the subject was completed in 2002. While the study itself was inconclusive, there were some interesting points to note. The study was a mail survey that asked respondents to self-disclose about whether or not they had ever illegally parked in a disability parking spot. Even though many studies show that more than half of those who use disability parking spots do so illegally, only 6 of 109 respondents in the study admitted to having violated disability parking laws (Tierney, 2002). Since the study was anonymous, there should be little fear of legal consequences for admitting to having used disability parking illegally. However, the author of the study suggested that perhaps the social stigma of admitting to having violated disability parking laws may partially be a factor, especially since even those who did admit to having violated the law agreed fairly strongly (on a likert scale) that it angered them to see people park in disability parking spots illegally (Tierney, 2002). Of course, it may also be that a small number of violators are more frequently breaking the law, thus leading to a high number of offenders and with only a small number confessing to the offense.

In 2009, Seattle did a survey of how many vehicles were using a disabled placard to park in areas around the three major hospitals on First Hill. Part of their goal was to see whether or not people with placards were parking for over 4 hours at a time. Chart 1 shows the results of this study.

Chart 1:

Area	10am Count	2pm Count	% Placards Found at Both 10am and 2pm
Virginia Mason	41%	37%	54%
Swedish	44%	40%	37%
Harborview	4%	8%	36%

(SDOT, 2009)

It is apparent from this chart that there are a very high percentage of cars near both Virginia Mason and Swedish that are using disabled placards. Any cars found at both 10am and 2pm have been parked in the same location for at least four hours. In other words, around Virginia Mason, about 21% (54% of both the 10am and 2pm counts) of total vehicles in the area both have a placard and are parking for more than four hours. After considering that 60% of those parking are probably doing so illegally, it becomes quickly apparent that at least 12% of cars parked with a placard for more than 4 hours belong to someone who is abusing the law. The First Hill study shows that there is a valid need for some sort of change if turnover of spaces is to be increased.

Other cities and states across the U.S. are facing similar challenges in reducing abuse of disability parking. Reports from Kentucky, Massachusetts, and Connecticut were particularly informative and provide a broad spectrum of potential solutions to their parking problems.

In Kentucky, the recommendations were to: enforce stricter fines, implement technical countermeasures, tightening standards for issuing permits, increased enforcement by police and volunteers and educational programs (Jennings, et al., 2003). Stricter fines were applied to both those who falsely used placards and to any doctors who gave placards to those who do not qualify. Suggested technical countermeasures that seemed most plausible were using a holographic image on placards to make them more difficult to counterfeit and making a database of doctors who issue placards and individuals who abuse placards. The state also considered making it more difficult to receive a placard by requiring either a notarized statement to verify disability or an in-person visit to the local Department of

Licensing. Increased enforcement, such as disabled parking sweeps in combination with educational programs that emphasize the penalties for abuse of a placard were also suggested in order to get the publics' attention about the consequences of violating disability parking laws.

Massachusetts decided it had an issue with disability parking after a similar investigation as that in the First Hill neighborhood of Seattle. While they had similar findings about abuse on the street, they found that a major problem in Massachusetts was that judges were frequently throwing placard abuse cases out of court, which does nothing but discredit the work enforcers have done to catch those who abuse placards (Sullivan, 2007). They recommended taking several steps to decrease abuse. First, making the application for a placard more clear about the penalties for both doctors and individuals if they lie or exaggerate a disability. They also proposed having a registry system that references Social Security records to try and identify when an abuser is using the placard of someone who has deceased. A system to easily and anonymously report abuse of placards online was also put forward as it could make it easier for police and parking enforcement to know which placards to watch for. Finally, increased fines, as well as potential license suspension, and felony charges for altering a placard were also recommended (Sullivan, 2007).

The most recent state report was from Connecticut in January of 2010. They had similar recommendations as other states, including enforcement sweeps, media campaigns, volunteer enforcement, improving access to information about disability placards for parking enforcement officers, issuing window stickers instead of placards, and increasing fines (Ward & Grant, 2010). One of the key differences between this report and others was the suggestion of volunteer enforcement. RCW 46.16.381 section 12 allows for the use of volunteer enforcement in Washington, however Seattle does not utilize this authorization. Window stickers were also proposed, as they are more difficult to transfer between individuals and because, unlike placards, they can't be forgotten by those who have a legitimate disability (Ward & Grant, 2010). While this is an interesting recommendation, they admit that the standard across

the nation is to use the hanging placard, which could create difficulties if disabled individuals within the state were to travel to areas that exclusively use the placard.

These state reports, while they do not directly discuss effectiveness, do provide a broad cross-section of the various options available to Seattle as it searches for ways to decrease abuse of handicapped placards.

Approach and Methodology

The main purpose of this report is to gather information and create a framework for analysis so that the SCPWD is able to come to their own conclusions about the various options available to Seattle. As such, no direct recommendations will be made. Rather, the goal will be to provide a structure that is flexible enough to allow for many alternatives to be compared in a short period of time. Three main criteria will be used to judge each alternative. These criteria will be used to show how each possible alternative compares to others in a clear and simple effectiveness matrix. The advantage of this method of analysis is that it is relatively simple to compare a large number of alternatives in a short period of time. It is hoped that the SCPWD can put any possible solution to the test by using the criteria provided as a basis of comparison between various alternatives.

Alternatives

After reviewing the literature, there are 5 alternatives that should be considered to resolve the issue of abuse of disabled parking placards while at the same time ensuring a higher turnover of spaces. These are: four hour parking, an education program including enforcement sweeps, an increase in fines combined with making it more difficult for fines to be dismissed, improving databases and technology for enforcement, and doing nothing. These were selected because they both came up repeatedly in a review of the literature on the subject, and seemed plausible for use in Seattle. Many of them are a combination of ideas that seemed to work well together. None of these options are mutually exclusive; all or none could be put into effect.

Four Hour Parking

If this alternative were to go into effect, individuals with disability placards would be limited to 4 hours of parking instead of 8. It seems likely that it would be best to focus this type of change in the areas that have the biggest turnover/abuse issues, such as adjacent to downtown shopping centers and the First Hill hospitals.

Enforcement Sweeps & Education Programs

This alternative is a combination of two ideas that repeatedly came up as a pair in the literature review, presumably because they work much better in combination than individually. Enforcement sweeps would involve having certain periods of time where parking enforcement is focusing more directly on the issue of placard abuse. Just before the enforcement sweeps, it would be important to have some form of public service announcement warning of the sweeps and emphasizing the consequences of abusing disability placards. This type of education program could also extend to doctors and employers, although in different ways. According to Jane Hell, she has had great success in reducing abuse by simply contacting high level managers and asking them to tell their employees not to abuse disability parking (personal communication, November 10, 2010). It may be possible to work with employers in areas with a high concentration of suspected abuse in order to reduce the possibility that their employees may be illegally using disability parking placards. Doctors also need to be educated about what disabilities actually qualify for a placard. Many doctors may be unwilling to question a patient's request for a placard, or may not understand that the disability needs to be severe enough that a patient can only walk short distances or with an assistive device of some sort. In addition, a better understanding of the use of temporary placards may help doctors become more willing to use them instead of a permanent placard if they believe a patient's condition may improve.

Increase Fines/Make it Harder to Reduce Fines

A third alternative would be raising the fine for violating disability parking laws. Current fines are set at two hundred fifty dollars according to RCW 46.16.381 and SMC 11.23.400, with the possibility of having to do 40 hours of community service after a second offense. It is important to note that at this level, abusing a placard to get free parking pays for itself, even including the cost of potential tickets. For example, if a day of parking downtown costs about \$15 for 8 hours, abusing a disabled placard saves about \$75 a week. By the end of the month, the savings from free parking is about \$300, which is significantly more than the cost of potentially having to pay a \$250 fine for using a placard illegally. Doubling this fine and making the community service mandatory for repeat violators could deter people who are considering abuse of a disabled placard to get free downtown parking. However, according to Jane Hell, one of the major problems she sees is that judges frequently dismiss most of the fine (SMC 11.23.400 currently allows the court to suspend up to half of the fine) and community service (personal communication, November 10, 2010). This was also found to be the case in Massachusetts, where much of the hard work of catching abusers was diminished when their cases were simply thrown out of court (Sullivan, 2007). If the fine were to be increased, it would be most effective were the judges in parking court were to be more restrictive about whose fines they dismissed. This is especially the case if the person ticketed isn't the individual who owns the placard they were caught using. It may also be useful to increase the fines for people who use the placard of someone who has deceased. Since there is no possible way to excuse this type of use, a strict fine, such as towing a car that is displaying the placard of someone who has passed, could be implemented

Improving Databases/Technology for Enforcement

This alternative has two separate items to consider: an increase in tools to help enforcement, and an improvement to the databases that are available to parking enforcement officers. According to Jane Hell, until recently all officers on the Disability Parking Enforcement Task Force had blackberries that allow them to run placard numbers in order to find out if there is a possible violation (personal communication, November 10, 2010). With the addition of five new employees on the task force,

however, there is a need for additional blackberries so that everyone is able to access the data they need to better enforce disability parking laws. Ensuring that all parking enforcement officers, not just those on the Task Force, have easy access information about the issuance of placards would make them better able to catch placard abusers. In addition to this, it may be useful to consider updating databases to include the name of the doctor who issued a placard as well as cross-referencing with Social Security or other sources to ensure that parking enforcement knows whether or not a placard belongs to someone who has deceased. Having the issuing doctor's name on file, according to Jane Hell, would help track whether certain doctors were issuing a disproportionate number of placards either fraudulently or to individuals who tend to abuse them by letting family members or friends use or take their placards (personal communication, November 10, 2010).

Do Nothing

The final option is to do nothing and to allow current trends to continue.

Other Alternatives Worth Mentioning

There are also three options that will not be considered for this paper, but that deserve note: changing the wording of the RCW, removing free parking for the disabled, and working with the state to change the way placards are issued. These ideas are not written about in more depth because they could easily be implemented, would have severe backlash, or would require state level changes (respectively).

Changing the Wording of the RCW

According to Jane Hell, a recent change in the wording of RCW 46.16.387 (7) has made the job of parking enforcement officers much more challenging (personal communication, November 10, 2010). In the RCW, the word 'traffic' was changed to 'parking' which has "destroyed the ability to issue traffic citations to drivers for the Unauthorized Use of a Disabled Placard" (J. Hell, personal communication, November 10, 2010). Essentially, this change has made it so that, rather than ticketing a violator and confiscating the illegally used placard, the Parking Enforcement Officer has to ticket the vehicle and is

unable to confiscate the placard. Jane Hell advised that changing the wording back to ‘traffic’ would be one of the single most helpful and easy changes needed to assist Officers in catching those who abuse disabled parking placards. Since this change seems relatively simple and self explanatory, it will not be considered as an alternative below, but rather as a direct recommendation for the SCPWD to pass along to the City Council.

Removing Free Parking for those with Placards

When I spoke with Edward Neuberg, ADA Compliance Officer with the city of Denver, he advised me that it is important to remember that the ADA does not require cities or states to give people with disabilities special parking rights such as free or extended parking (personal communication, November 16, 2010). The ADA is about ensuring equal rights, and this means making sure that the disabled have the ability to park on the street just like everyone else. According to the Department of Transportation, Seattle’s new electronic pay stations are all ADA accessible (SDOT, n.d.), so it is within the realm of possibility to have people with disabilities pay for their parking. While making people with disabilities pay for parking would dramatically reduce the incentives for the non-disabled to use placards, it also hurts those with a limited income who may not be able to afford the cost of parking. Because of this, the alternative of removing free parking for those with placards is not considered in this paper.

Tightening Standards Renewal/Replacement of Placards

This option would require working with the state to change the way that placards are issued and renewed. Any change at the state level would require a different approach, and is not within the scope of this paper. However, this could be a good option if the state is willing to work with Seattle to change these laws. Ideally, issuance and renewal of placards should take place in person and at more frequent intervals. In Washington, at five years we have one of the longest periods of time between renewal of permanent placards (Jennings, et al., 2003). Only five states issue permanent placards for longer periods of time, and over thirty states use periods of time ranging from one to four years (Jennings, et al., 2003). It may be useful to consider reducing the interval between issuance and renewal to 3 years, and require

renewal in person at a Department of Licensing building in order to prevent abuse and renewal of placards belonging to someone who has deceased. In addition to this, making it more costly or difficult to get replacement placards could prevent other types of abuses. According to Jane Hell, there is no limit in the number of placards that can be replaced for free if lost by an individual (personal communication, November 10, 2010). As an example, Jane Hell described a situation where an individual has had his placard replaced 13 times in less than a year (personal communication, November 10, 2010). While placards reported lost are put in the system as being inactive, this does not prevent individuals from using them until they are caught. It may be worth considering charging a replacement fee, or reducing the number of placards that will be issued per year. For example, perhaps charging \$20 per placard replaced, and/or a cap of 4 replacements per year unless there are extenuating circumstances, such as the theft of a placard that has been reported to the police.

Criteria of Evaluation

There are three criteria which can be used to judge the outcome of each response to the problem: efficacy, cost and equity. Since we do not have the luxury of taking local observations for each alternative, for the purposes of this project each alternative will be judged based on research, professional opinions (where possible), and the results seen when an alternative was implemented in another location.

For this problem, efficacy is defined as both how successful each alternative would be at catching individuals who use disabled parking placards illegally, as well as whether or not there is increased turnover of spaces in high traffic areas. This would include the potential increase in number of tickets issued as well as a decrease in abuse/increase in turnover in high traffic areas.

The cost of the various suggested alternatives varies widely. In order to gain the best understanding of cost, it would be important to estimate both the immediate cost of implementing the program as well as the long term costs of maintaining a specific alternative. This is especially important

since several alternatives may have a high initial investment cost, but a low maintenance cost, while others are exactly the opposite, with very little investment, but higher maintenance costs.

Equity, in some ways runs parallel to efficacy since reducing violations directly involves an increase in equity. However, many alternatives may require a higher level of effort for people with disabilities than is currently expected. This measure will look at how much a new alternative might infringe on the rights that many with disabilities have grown used to. It is important to note that this does not mean that these alternatives violate the ADA or are inequitable to those with disabilities. While some options may make things more inconvenient for those with disabilities in the short run, they may also lead to a reduced level of abuse as well as an improved availability of parking when it is needed.

Analysis & Effectiveness Matrix

For the analysis, I will start by using the criteria described above to evaluate each alternative. Because little qualitative evidence is available, many of these will be predictions based on what evidence we do have available as well as some current experiences from those who have tried various alternatives. The alternatives will be analyzed in the order they were offered earlier: 4 hour parking, an education program including enforcement sweeps, an increase in fines combined with making it more difficult for fines to be dismissed, improving databases and/or technology for enforcement and doing nothing. A matrix will also be provided to briefly compare all alternatives.

Four Hour Parking

Reducing disability parking from 8 to 4 hours could potentially reduce the incentives that the non-disabled have to abuse disability parking. If they can no longer park for their entire work day by abusing a placard, then they may be more likely to find alternative parking or ride public transit. However, this would not keep individuals from just moving their cars over lunch break in order to bypass the 4 hour parking limit. Colorado has had a 4 hour parking limit for people with disabilities for over a decade, however the effectiveness of this is questionable. Edward Neuberg, ADA Compliance Officer with the city of Denver, told me that despite their 4 hour limit, the turnover of parking due to use of handicapped

placards is still a big problem in their state (personal communication, November 16, 2010). He admitted that our 8 hour limit should definitely be worse than the 4 hour limit, but the decrease in parking time does not keep placard abusers from simply moving their car over lunch (Edward Neuberg, personal communication, November 16, 2010). Based on this, it is appropriate to say that the efficacy of the 4 hour alternative is probably moderate; the change will help, but it won't solve the greater problem of abuse or significantly increase turnover of parking since many vehicles will simply be moved from one spot to another. Cost for this option is relatively low, and would involve an informational campaign to ensure that those with placards fully understand the new parking laws. In addition, some new signs may need to be purchased to remind individuals of where the shorter parking limit is in effect. The level of equity for this alternative depends on your perspective of the issue. Many with disabilities have grown used to having 8 hours to park, and see a change to 4 hours as an infringement on their rights. Getting out of a car and moving around takes longer for those with disabilities and there is a fear that the reduced parking time may leave them in a position where they are unable to return to and move their cars before getting ticketed. However, a reduction to 4 hours of parking time is not in violation of the ADA or state accessibility laws. By the definition of equity provided above, it is fair to say that a change to 4 hour parking would have low equity since it reduces the current benefits held by those with disabilities. Overall, this alternative has a moderate level of efficacy, low cost, and low equity.

Education Program Including Enforcement Sweeps

Using an educational program in combination with enforcement sweeps, could be a good way of letting the public know that Seattle is serious about the abuse of handicapped placards. This program would replicate the famous 'Click it or Ticket' campaign that has been considered a success, especially when both education and enforcement sweeps are used in combination (U.S. Department of Transportation, 2010). Because of this, it can be assumed that a similar program for reducing disability parking abuse would be most effective when education and enforcement are implemented as a pair.

Assuming this is the case, efficacy of this alternative is likely to be high, as individuals take more notice of the problem and become aware that enforcement is likely, which should result in a higher turnover of parking spaces. While there will probably be an increase in ticketing revenues due to the enforcement sweeps, it also would be costly to purchase advertising and increase enforcement. High initial costs of a large media campaign followed by moderate costs of reminding people of enforcement sweeps from year to year would give this alternative a moderate to high level of cost. The overall equity of this program is high since it would not interfere at all in the day-to-day lives of those with legally issued disability placards, and would likely make it easier for the disabled to find parking close to their destination. It is important to note that including education for doctors in this alternative would increase efficacy and cost, with a potential decrease in equity since it might make doctors less willing to issue placards. If an educational campaign was combined with enforcement sweeps, there would be a high level of efficacy, high initial cost of implementation (with more moderate costs as time goes on), and high level of equity for those with disabilities.

Increase in Fines Combined With Making it Harder for Fines to be Dismissed

Increasing the cost of tickets for violating disability parking laws has been used in many areas as a cost effective means of trying to reduce violations. We cannot expect an increase in the number of tickets issued or higher turnover of parking spaces unless there are extra measures taken to enforce parking laws. It is possible that the fear of being ticketed will increase dramatically with a higher fine, especially if that fine can't be dismissed in court. However, in her study of why people abuse handicapped parking, Tierney stated that that illegal parkers' "previous experience with low rates of enforcement decrease the effectiveness of threatened sanctions" (2002). In addition to this, according to Jane Hell, many who use disabled placards illegally have the majority of their fines reduced or totally dismissed in court (personal communication, November 10, 2010). If this alternative is implemented, it will be far more successful if judges are less able to dismiss the increased fines. Efficacy of this alternative is hard to judge, but it would probably be relatively low unless it was combined with increased levels of enforcement.

Fortunately, the cost of implementing this measure should be low. The biggest cost will be changing signs or adding something to the sign that indicates the increase of cost of violations. Over time, the increased revenue from this alternative could pay for the signs, as well as potentially bring in more money for the city. As long as judges in traffic court are still able to dismiss any fines given to those who are legally disabled, this option has a high level of equity. Increasing fines in combination with making those fines harder to dismiss has a relatively low efficacy, low cost, and a high level of equity.

Improving Databases/Technology for Enforcement

This two pronged alternative is mainly intended to make it easier for Parking Enforcement Officers to catch placard abusers. Having access to the information they need to do their job will allow them to issue more tickets over a shorter period of time. Making it easier to track doctors who are potentially abusing or misinformed about the law will, hopefully, lead to a decrease in illegally issued placards (Jane Hell, personal communication, November 10, 2010). Overall, the efficacy of this alternative is likely to be high since it would increase the ability of Parking Enforcement to issue more tickets in a shorter period of time, thus increasing parking turnover, as well as making it easier to catch any doctors who are issuing placards fraudulently. Any type of new technology or improved database comes with a high initial setup cost, however, once it is setup, the cost of maintenance is relatively low. Since this alternative is also likely to bring in an increase in ticketing revenue, the overall cost of this alternative is only moderate. Equity will be high, since the only possible issue that a person with a disability might encounter with this alternative is that doctors may be less willing than in the past to issue placards to the 'borderline' disabled. The option of using technology and databases to decrease abuse will have an overall high efficacy, high initial costs (moderate to low costs as time goes on), and high equity.

Do Nothing

The final alternative is to change nothing. With this, the effectiveness would be equivalent to whatever the current method of enforcement is, there would be no cost, and equity would not change.

Effectiveness Matrix:

Criteria			
Alternatives	Efficacy	Cost	Equity
4 Hour Parking	Moderate—While this would decrease the level of abuse, there is nothing to keep individuals from just moving their car every 4 hours	Low—The only cost is whatever education or signage is necessary to ensure those with disabilities know about the change	Low—This alternative could potentially negatively affect those with disabilities, especially if they have doctors appointments for longer than 4 hours
Education Program Including Enforcement Sweeps	High—Education combined with enforcement sweeps has been quite effective for other issues, as it draws the attention of the public to the problem	High—Initial costs of the media campaign would be high, but over time this would decrease to only a moderate cost as fewer commercials are needed	High—This would have no affect on those who use placards legally
Increase in Fines and Making it Harder for Fines to be Dismissed	Low— Without measures to increase patrols, there is no reason to believe more tickets will be issued or that parking turnover will be higher	Low—The only cost would be the expense of changing signage to reflect new cost, and over time that can be recovered from the increase in revenues from the higher ticket cost	High—Unless someone with a legal placard is wrongly issued a ticket, this alternative will have no effect on those with disabilities
Improving Databases/Technology for Enforcement	High—Making the job of Parking Enforcement Officers easier is likely to result in more tickets being issued and higher turnover in parking	Moderate—While initial set-up costs of buying new equipment and organizing a database would be high, over time this would decrease	High—This alternative would have little effect on those who are currently disabled and use a placard legally
Doing Nothing	Very Low—Over time this problem is likely to get worse since the number of disabled individuals is growing	Free—No new plans means no new costs	Moderate—While doing nothing would not immediately effect those with a disabled placard, in the long run reduced parking availability would decrease equity

Best Options	Good Options
Worst Options	Bad Options

Conclusion

As stated earlier, it is not the intent of this paper to recommend a specific path of action. Rather, it is hoped that this can provide a foundation that the SCPWD can use to build upon before they make their recommendations to the City Council. Seattle is not the first city to encounter abuse issues with disability placards. As long as there are incentives for the non-disabled to use handicapped placards such as free and extended parking, then there is likely to be some level of abuse. While reducing those incentives would likely lead to a dramatic reduction in illegal use of placards, it would also limit the ability for those with real disabilities to be able to live their day to day life in a comfortable manner. Finding a balance between these two extremes is crucial if the problem of disabled placard abuse is to be resolved in a satisfactory manner. The focus of this paper has been to look at a few options that were most commonly seen in the literature review, however there are many other alternatives that may be more effective for the City of Seattle. Using a few basic criteria such as efficacy, cost and equity allows for decision makers such as SCPWD or City Council members to have an easier time comparing possible solutions to each other. It is apparent that some change needs to be made in the way Seattle deals with placard abuse; ignoring the problem will only make it worse.

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Seattle cracking down on disabled-parking permits

By Jack Broom

Seattle Times staff reporter

A Seattle motorist ticketed last month for using the disabled-parking pass of someone who's been dead for eight years might have been unusually nervy, but certainly isn't alone.

"It's a growing problem, and many people are clearly abusing the system," said Seattle City Councilmember Jan Drago, introducing an ordinance unanimously passed by the council Monday to crack down on those who misuse the permits.

Mayor Greg Nickels, who had called for stronger measures against disabled-parking cheaters, applauded the council's action.

A city sampling in 2004 showed more than 75 percent of disabled-parking placards examined were being used improperly, but efforts to curb the abuse have been restricted by the fact that, in most cases, citations had to be presented directly to the driver, meaning an officer needed to be present when the motorist arrived or departed.

In addition, the fine for using an expired permit has been only \$38.

But under provisions passed Monday, a ticket carrying a \$250 fine can be left on the vehicle if a computer check shows the placard is invalid; either expired, reported lost or stolen or issued to a person who has died.

The practical effect is that citations now can be written by all 80 of the city's parking-enforcement officers, instead of the half-dozen task-force members who've had the assignment until now, said William Edwards, parking-enforcement director for the Seattle Police Department.

Edwards said 74 citations involving disabled-parking passes were written last month. In half of those cases, he said, the permit itself was invalid for one reason or another.

The problem is particularly acute, Edwards said, around hospitals, clinics and schools, some of the destinations where disabled people most often need access, but find all parking spots already taken by other vehicles with disabled-parking placards.

"People who legitimately use these permits are being denied the accessibility they need by others who are just trying to get out of paying for parking," Edwards said.

Statewide, the Department of Licensing currently has more than 1,059,000 active disabled-parking permits, either permanent or temporary, including nearly 85,000 issued to drivers with Seattle addresses, said Brad Benfield, licensing spokesman.

In addition, Benfield said the department has records of more than 757,000 "inactive" permits in circulation; permits that have expired or for some other reason are no longer valid. A qualifying applicant can get two parking placards, for which there is no charge.

When a permit holder dies, his or her parking placards are supposed to be returned to the Department of Licensing, but Benfield acknowledged that they are not in many cases. He said the state relies on local law-enforcement agencies to police the use of the permits.

Drago, chair of the council's Transportation Committee, said on-street parking has continually been getting harder to find in Seattle. Parking-pass abusers are compounding the problem, she said.

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Attachment E

Seattle Residents Respond to Disabled Parking Placard Abuse

Online comments in response to July 2009 Seattle Times article "Seattle cracking down on disabled-parking permits"

There are almost no designated handicap spots downtown.

Every year there are fewer and fewer empty disabled parking spaces in the places I need them because there appears to be rampant corruption in the misuse of the placards. As a legitimately disabled person who needs to use the spaces, I wish there was a telephone number we could call to report people parking in the spaces without any sort of placard. I've tried calling the posted number, leaving a message on someone's voice mail does not encourage the thought that anyone is going to do anything about illegal use of the parking spaces.

Pay \$5 to get a new one sent every year.

Doctors and the state are 2/3 of the problem

Seems like an easy fix. Someone mentioned bar codes, but the same technology that the state uses for tolls on the Tacoma Narrows bridge would probably work better. Use RFID chips in the placard and give the police an RFID reader that shows if the placard is valid. I would think RFID chips are harder to counterfeit.

My wife has a handicap placard. Being able to park in handicap spots close to buildings and events is really helpful. But "free and forever" - forget it. If there's a time limit, it should be enforced for everyone. And if one can afford a car, gas and insurance; they can afford to pay for parking. If it's free, it should be based on financial need.

As someone who is physically disabled, I know how hard it is to find an open handicapped spot. Putting time limits on parking spaces near hospitals is not a wise decision. Sometimes a hospital visit can take longer than four hours. What are you supposed to do then? I understand the need to free up space, but it should be near shopping, not hospitals.

This is an area where a lot of city employees use disability placards to park all day.

As for people going to doctor or hospital visits, if you know you could be over 4 hours, just pay for a spot in the garage. If you can't afford that - call Metro Access or get taxi script! There are organizations who will drive you. Those services are just for this purpose.

Occupying a space for 8 hours for free prevents others who truly need to get into downtown and out in less than 4.

As for revamping the program, lots of good ideas here in this blog today. I hope the state pays attention and acts on them, especially reviewing the requirements with medical providers.

How about rotating placards each year or every two years that are color coded, so it's easy to spot the

phonies?

These disability placards are heavily abused. At the UW there are people who park all day, every day in normally metered spots where everyone else has to pay. I've watched people pull up there, sit in their cars until they think no one else is looking and then quickly put a placard on their mirror and get out and walk just fine into the building. I've even confronted some of them. Disabled need a place to park, but not all day for free anywhere they wish.

How about reining in those fake users?

I have a VERY limited income, but I'm not disabled, but I still have to pay, but someone who is wealthy but just happens to be handicapped doesn't? That's not exactly fair.

Eliminate the scofflaws & fakers and you solve the shortage problem for those with 'true' disabilities.

Set disability standards with criminal (misdemeanor) penalties for perjury. Give the govt the ability to give a ticket to a faker!

You see from the bulk of the comments - we're all aware of the fakers and scofflaws abusing the system. Shame on the govt for making this so easy.

Go after scofflaws and solve most of the problem - those using someone else's placard. Parking Enforcement should 'run' the number (barcode?) on the placard. If issued to someone deceased, impound the car and confiscate the placard. Expired placards would get a ticket, which could be waived when the placard is renewed.

Is someone at the city planning to enter Americas Funniest Home Videos? Because every day at noon all the sidewalks will be full of wheelchair users trying to maneuver around each other to play "musical parking spot". Really, not a funny or smart idea at all.

On the first violation the vehicle would be impounded and the ticket would be say 500 dollars. 2nd, impounded and 2500 dollars. 3rd vehicle is confiscated (that means the driver doesn't get it back).

Cars of abusers should be towed, not ticketed. Period.

Come up with a method to catch them and deal with them harshly - maybe impound the car.

Having needed a permit for several months last year after surgery, I'm pretty aware of the permits. Also being a bit of a snoop, I seem to see a lot of cars with permits tucked amongst what looks like salesmen materials or delivery items. Seems like a lot of handicapped salesmen and delivery people.

This is all well and good, but what about those of us who really are disabled? You cannot always be sure that what you need to do is going to be less than four hours. What then?

Legitimate users are not able to find spots. This time limit helps your chances of finding an open spot.

The point of metering a parking space is to encourage people to use those spaces for shorter term parking to

benefit all of us. Twice the time limit at still no charge sounds pretty generous to me, even if it is less than what is granted now.

SDOT Exchange with Northwest Women Wheelers and General Comments on Proposed 4-Hour Parking Limit - November 2010

“When we met w/Allison several months ago, she said it would not apply to DP plates -- so I exchanged my placard for plates. I work downtown and drive to work as little as possible ... and when I drive I park for more than 8 hours. I hope they let DP plates park for 8 hours ... at least in downtown Seattle. My 2 cents ...”

Hi Char,

Earlier this year (when we met with a few of the Women Wheelers), the proposal was for placards only (and we were under the expectation that plates could be exempt). After further review with our Law Department and discussion with the State Dept of Licensing, we were informed that we could not make a distinction between placards and plates – that a four hour time limit would apply to all permits.

We discussed this point of clarification at the most recent meeting with members of the Commission. I’m so sorry if we set up that expectation at previous meetings. The handout and our website <<http://www.seattle.gov/transportation/parking/disabledparking.htm>> reflect the most updated proposal.

Please don’t hesitate with other questions.

Thanks,
Allison

“I've spent up to 4 hours just waiting for a prescription or to get in to see my doctor at Harborview (because an emergency came up for them). Of course 40 percent of parking by hospitals is used by people with disabled placards! How can anyone see that as a problem?

Also, our other option of adding up to 6 hours to our commute time with Access... wonderful. Horrible Access! - is a major issue for all of us who battle with fatigue. Finally, if the big issue at hand is people misusing permits, why not crack down on that instead on all of us who take a little longer to do our everyday things?!?!”

“Once again the disabled get the shaft. Thanks, SDOT, for making our lives that much harder. The real problem is the person using dead granny's placard. “

“Parking abusers use "alive" granny's placard too.”

“I wonder if the misuse & abuse of placards is going to get worse with the price of parking at meters going up in Seattle.”

For history: From Allison to NW Women Wheelers last spring:

Thank you very much for your comments on the 4-hour time limit proposal for disabled parking placards. Just to clarify – the proposal only applies to placards – it would not apply to disabled parking license plates or tabs.

This is a serious and sensitive issue that we have been trying to take on from the enforcement side for some time. It is easiest to fine people for using placards that have expired, that are registered to a deceased person, or that have been reported as lost or stolen. It is much more difficult to track down and fine someone for using their grandmother's placard to park for free all day downtown.

Another part of the problem is the frequency and level of discretion used by physicians who write prescriptions for placards (new ones and renewals). We're working to make some changes at the state level to make sure doctors are doing their part to help reduce placard abuse.

The four-hour time limit is an additional tool that we could use to get at this issue. It is certainly not meant to inconvenience those with legitimate needs, but rather, to open up short-term access for everyone, including the disabled.

Thank you again for your feedback. Please let me know if you'd like to be added to an email list to be kept up to date on this proposal (it sounds like it, but I don't like adding people to email lists without their approval).

Best,
Allison

Attachment F

Proposed Changes to RCW 46.16.381 and SMC 11.23.400 Related to Parking with a Disabled Placard

Background: A parking study conducted in 2004 brought to light the massive abuse of disabled placards (D/Ps) on the streets of Seattle. The SPD Traffic Section began to address the issue by having a couple of Parking Enforcement Officers (PEO) work with Traffic and Patrol officers to issue citations for the violations. After the initial training, all believed the number of abusers would decline. Unfortunately, enforcement was increased after it became clear that rampant abuse of disabled placards was eroding the revenue generated from parking meters and pay stations. The availability of a parking space for a person with a disability is greatly impacted by the abuse. There have been three training sessions to add additional Parking Enforcement Officers to the Disabled Placard Task Force to address the challenge. Currently, the task force is comprised of 9 PEO's working part time and one full time to address the issue.

Costs: The amount of revenue lost each year as a result of D/P abuse is significant. One vehicle occupying a space, obtaining and/or using a placard fraudulently, costs the city approximately \$4,000/year or \$20,000/5yrs. A conservative number, based on three (3) vehicles per block displaying disabled placards fraudulently, costs the city \$12,000/yr or \$60,000/5yrs. This number would simply double or triple in the higher abuse areas. The rate of abusers vs. the number of vehicles driven by a person with a disability is roughly 60% to 40%. On any given day, there is a minimum of three vehicles displaying placards on a city block. However, some areas around city/county/state buildings and hospitals, the numbers soar.

An Essential Tool for Enforcing the Abuse of the Disabled Placards

- A word was changed in RCW 46.16.381(7) during the 2010 legislative session that destroyed the ability to issue traffic citations to drivers for the *Unauthorized Use of a Disabled Placard*. We issued these citations under SMC 11.23.400 ©. Unfortunately we have a very high abuse of disabled placards. Notwithstanding the fact that it deprives the person with disability from finding a parking close to their destination, it robs the City of Seattle of the much needed revenue during this tough economic economy. The word "parking" **needs to be changed back** to "traffic" so we have the capability of issuing traffic infractions again to fight this crucial issue.

RCW 46.16.381 (7)

Recommendations: Several **changes** should be implemented to reduce the number of spaces occupied by abusers of disabled placards.

RCW 46.61.582 Free parking for persons with disabilities.

Any person who meets the criteria for special parking privileges under **RCW 46.16.381** shall be allowed free of charge to park a vehicle being used to transport that person for a period of four hours ~~[unlimited periods of time]~~ in parking zones or areas including zones or areas with parking meters which are otherwise restricted as to the length of time parking is permitted. This section does not apply to those zones or areas in which the stopping, parking, or standing of all vehicles is prohibited or which are reserved for special types of vehicles. The person shall obtain and display a special placard or license plate under **RCW 46.16.381** to be eligible for the privileges under this section.

Remove-“unlimited periods of time”

SMC 11.72.065 Disabled parking - Violation. [change from unlimited parking to four hours]

SMC 11.23.380 Disabled person's parking privilege. . [change from unlimited parking to four hours]

13) For second or subsequent violations of this section, in addition to a monetary fine, the violator must complete a minimum of forty hours of:

(a) Community restitution for a nonprofit organization that serves persons having disabilities or disabling diseases; or

(b) Any other community restitution that may sensitize the violator to the needs and obstacles faced by persons who have disabilities.

SMC 11.23.380

...add 2nd & 3rd Offense in this section

(14) The court may not suspend more than one-half of any fine [for the first offense] imposed under subsection (7), (8), (9), or (11) of this section.

SMC 11.72.440 Parking Enforcement

- **Increase and graduate fines for abuse.** Increase the fines as a deterrent and serve as an incentive for officers to focus more effort on abuses.
1st Offense - \$250 Current penalty cannot be reduced less than one half.
Propose addition of the following:
2nd Offense - \$500 Penalty cannot be reduced, 40 hrs. Community service
3rd Offense - \$1000 Penalty cannot be reduced, 40 hrs Community service. Loss of driver's license/30days
RCW 46.16.381/SMC 11.23.380/ SMC 11.72.065
- **Accountability - Strengthen D/P Placard Replacement Standards.** The disabled placard program does not have a protocol relating to the number of placards that can be replaced within a period of one year, let alone the expiration period of five years. A number of placard holders that have replaced a placard 12 times within a one-year period. Many of these are given to friends and/or family or exchanged for monetary consideration to use them illegally. There have been many instances, when a driver has been issued a citation for unauthorized use of a placard, then within a few hours, the RO of the placard (or other individual) will have it replaced. If a person alleges that their placard was lost or stolen, a police report should be taken via phone to the dispatch center to obtain an incident number. The incident number should be required to replace the lost/stolen placard. The maximum number of placards to be issued within a year should be two, or a maximum of three for the life of the placard. A \$20 fee would be assessed on replacement placards after the original(s) has been issued.
RCW 46.16.381 (2)/ SMC 11.23.400
- **Strengthen Physician Requirements.** There is a need for media releases to educate physicians of the penalties that can be imposed by the court when the guidelines are not followed in RCW 46.16.381, to qualify a patient for a disabled placard. The following statement was given by a

Seattle Physician, Therese Law, MD in 2004 who is a strong advocate relating to the abuse of disabled placards. “As physicians, we’re the gatekeepers for who qualifies for the placards and who doesn’t. Most doctors don’t realize that falsely qualifying a patient for a disabled placard is a criminal offense with a \$5,000 fine and a year in jail. It’s up to us to be responsible in our decision-making and to help ensure that those who are issued placards get them for the right reasons.”

Strengthened state oversight and increased penalties for physicians’ abnegation of their responsibility under the law should be imposed.

RCW 46.16.381 (2)

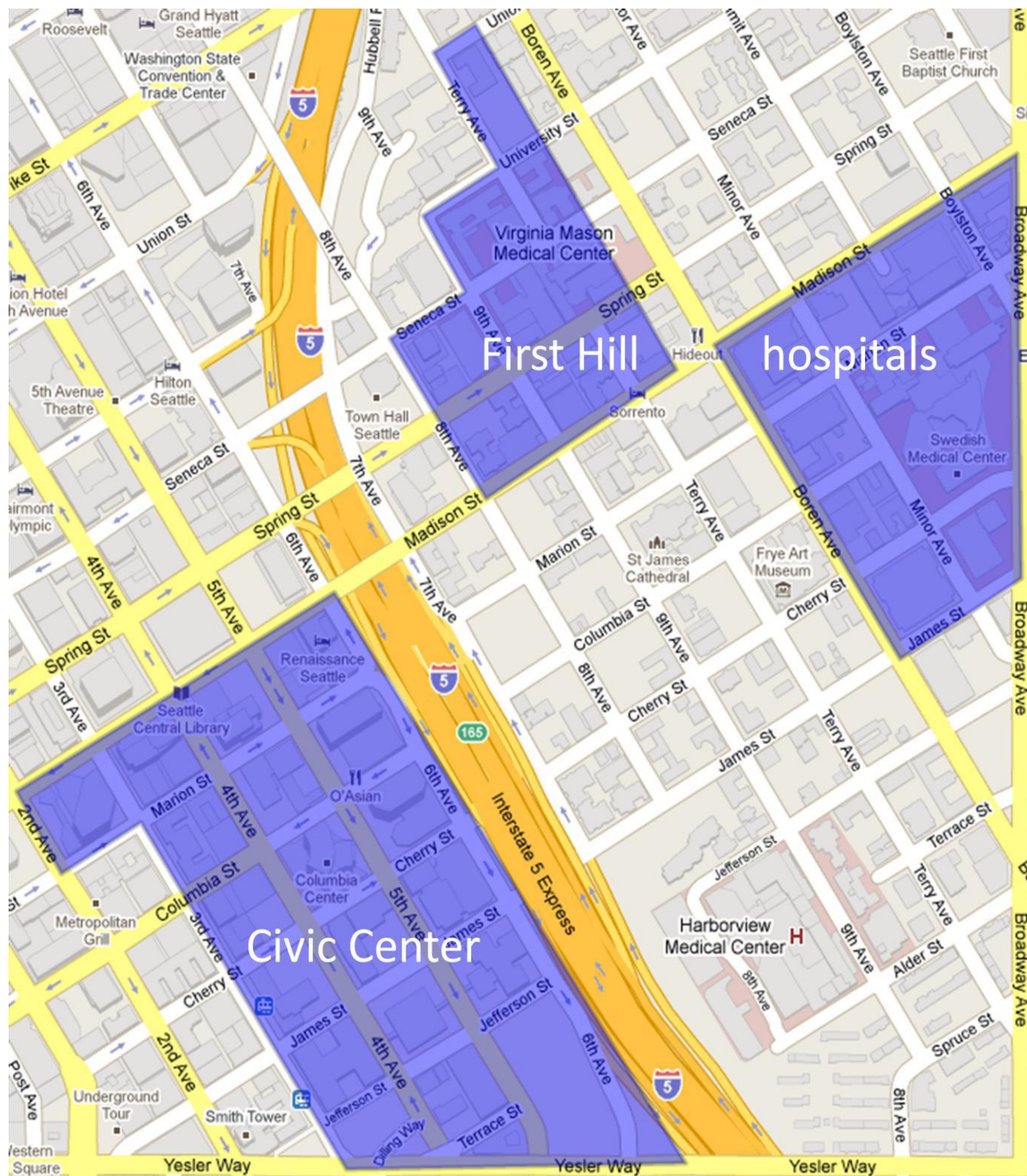
- **Renewal of DP Placards -**

Strengthen D/P Placard Replacement Standards. The renewal period should be changed to three (3) years from five (5) years! The disabled placard program does not have a protocol relating to the number of placards they can be replaced within a period of one year, let alone the expiration period of five years. There is no accountability. Currently the person with the disability can renew their privilege to receive a new placard through the mail. This opens up the enticement for exploiting the system as we have been encountering. There have been two instances when the driver/violator has been cited for unauthorized use of a disabled placard; The RO of the placard had been deceased for six years and the other seven years. This opens it up to a high incidence for abuse. The person should be required to have a completed application from the doctor taken to DOL for each renewal. A person that has a disability will be visiting their doctor on regular basis; consequently it should not be a hardship for them.

RCW 46.16.381 (2)/ SMC 11.23.400

Attachment G

Proposed areas for 4-hour time limit for vehicles with disabled parking permits



Potential Changes to Seattle's Disabled Parking Rules

October 2010

The City of Seattle is committed to ensuring that on-street parking is managed effectively for short-term users, including those with disabled parking (DP) permits.

To improve parking access for legitimate permit holders and other parkers, SDOT is proposing 4-hour time limits to paid parking for vehicles with DP permits in parts of First Hill and Downtown. This would apply to vehicles with placards, license plates, and tabs. Parking would remain free.



We are interested in your feedback

- Please contact Mary Catherine Snyder at (206) 684-8110 or marycatherine.snyder@seattle.gov, or Allison Schwartz at (206) 386-4654 or allison.schwartz@seattle.gov
- Learn more at <http://www.seattle.gov/transportation/parking/disabledparking.htm>

Why take action?

- As of early 2009, there were over 750,000 *inactive* DP placards inappropriately in circulation statewide. They represent “golden tickets” to free on-street parking, especially in downtown Seattle where monthly off-street parking is relatively expensive.
- In areas of high parking demand like downtown Seattle, allowing vehicles to park all day is inconsistent with Seattle's Comprehensive Plan which prioritizes short-term customer use.
- Misuse of disabled parking permits limits access by all to First Hill hospitals, where 40% of spaces are used by vehicles with placards.
- On any given day in downtown Seattle, between 30 and 40% of spaces are filled with vehicles with DP permits. Parking enforcement reports that over 10% of placards are inactive.
- Other efforts to address abuse have been effective but limited, because it is relatively easy to obtain an unauthorized DP placard.

What else is the City doing?

A comprehensive approach is underway to improve access and reduce DP permit abuse:

- Enforcement – in 2009, a new City law increased citation fines for using an inactive placard. Since then, over 50 vehicles have received a \$250 ticket. Parking enforcement has a disabled parking task force
- State programs – Seattle is working with other cities and social service agencies to propose changes to state governing rules for improved accountability
- Community actions – First Hill hospitals are doing their part to educate staff and doctors about disabled parking permit laws

Attachment H
Statistics from Seattle Police Department

DP Stats 2004-2010

	2004	2005	2006	2007	2008	2009	2010	Totals
Citations for 11.23.400	34	105	284	433	485	445	258	2044
Confiscated Placards					478	437	251	1166
License plate not confiscated					1	1	2	4
Inactive Placards			From Sept 2007	118	179	151	95	543
Deceased				14	52	44	33	143
Expired				6	22	18	20	66
Replaced				18	83	67	28	196
Duplicate				2	2	3		5
Other				5	17	19	7	48
No Record					3		1	
Photocopy							2	
Confiscated w/o citation			80	143	73	106	73	475
Inactive Placards				89	61	78	59	287
Deceased				2	7	13	5	27
Expired				9	29	32	33	103
Replaced				8	16	34	18	76
Other					8	6	7	21
No Record					1			1
DP Invalid					From Oct-	59	184	243

DP Stats - 2010

2010	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Totals
Citations for 11.23.400	38	31	32	40	31	51	30	41	56				
Confiscated Placards	38	31	32	39	31	48	26	40	54				
License plate not confiscated									2				
Inactive Placards	12	12	19	10	13	22	13	19	16				
Deceased	3	6	6	4	5	5	4	5	5				
Expired	5	1	1	2	6	7	4	3					
Replaced	3	4	9	4	1	6	5	6	7				
Duplicate													
Other	1		3		1	4		5	2				
No Record		1											
Photocopy									2				
Confiscated w/o citation	7	10	12	15	5	20	5	29	19				
Inactive Placards	6	10	12	11	4	15	5	25	16				
Deceased		1		1			1	1	2				
Expired	3	2	8	8	3	13	3	21	6				
Replaced	3	7	3	2		2	1	2	3				
Other					1			1	5				
No Record													
DP Invalid	23	16	39	7	21	41	17	31	61				

Attachment I Newsletter Column from NW ADA Center

Can Cities Use Volunteers to Enforce Accessible Parking?

How many times have you observed someone parking in an accessible spot with no placard or license plate, and wished that a cop would show up? Do you ever wish you could give the guy a ticket? Should cities empower volunteers to enforcing accessible parking? Is there a downside?

The problem

It is fair to say that not every car parked in an accessible space is legally entitled to be there. “The problem is particularly acute,” according to William Edwards of the Seattle Police Department, “around hospitals, clinics and schools – locations where disabled people most often need access but find all parking spots already taken by others with – or without – placards.” Washington State currently has 1.1 million active disability parking permits, while Oregon, with a requirement for medical proof each time the driver’s license is renewed, has about 175,000 active permits.

Misuse of placards is widespread. State rules that authorize the permit for multiple years and allow little or no proof to renew have done little to curb abuse. Families may use the placard when the family member is not in the car, or even after his or her death. Phony placards have been fabricated. Doctors may authorize the permit too easily. Some drivers park in the spots with no pretense of having a disability.

At the same time, whether the person parking the car actually has a disability may not be obvious to onlookers who are unaware of non-apparent disabilities. How do you know if that driver has MS or a lung disease?

Is that car parked legally? City police and traffic departments struggle to keep up with more pressing problems. Some laws require the officer to be present when the driver leaves or returns to the car. They do the best they can.

The question

At the end of our monthly regional staff meetings with our affiliates in Idaho, Alaska, and Oregon, we open the floor to their recent challenging questions. **Dave Barton**, from Alaska, offered this: ***“I had a question from an Alaskan community that made me wonder how other cities handle this issue. They are thinking about using volunteers to enforce their accessible parking spots, and I want to help them think through all the pros and cons. What do you know about this?”***

Our answer

Cities in at least 20 states have programs involving volunteers who help enforce accessible parking, and some now have almost two decades of experience. Their use is much more

common that most people realize. The use of volunteers, however, raises several important questions.

Is it actually legal for a law enforcement agency to use volunteers in this manner? Can they issue citations?

- Oregon Revised Statue – 811.632 authorizes law enforcement agencies to appoint volunteers, who have the ability to issue citations.
- Washington RCW 46.16.381 requires volunteers to be at least 21 years old, and they can issue infractions.

What type of role do the volunteers assume in helping enforce the rules?

Across the states, the role of volunteers in parking enforcement ranges from photographing cars parked illegally and submitting the photograph to the police department all the way to wearing a uniform and being able to issue warnings and citations. Our survey of Washington State communities using volunteers found all were allowed to issue citations. Many programs require volunteers to appear in court when requested. Some use the volunteers to educate the business community on signage requirements and parking laws. They may follow up with businesses that are out of compliance with a three-stage letter process. Volunteers may also cite abandoned cars.

What is their commitment? Is turnover an issue? What factors tend to discourage their continuing participation?

Many of the volunteer programs have a monthly commitment in hours (example, two 4-hour shifts) and require a one-year commitment. They go through background checks, and typically use their own cars. The cost of gas hurt a number of volunteer programs, while some volunteers are dismayed by how angry violators become when they get a ticket.

Do they receive training? What is emphasized? To what degree is safety a serious concern?

Training is critically important, and is mentioned in the legislation, and ranged from 4 to 32 hours. Beyond the nuts and bolts training to follow police procedures, volunteers are trained to deal with conflict management. Many receive training in CPR, First Aid, Safe Driving, Blood-borne Pathogens, and other safety issues. In some cities, volunteers work in pairs as a safety precaution. The use of more official cars/vans also seems to enhance safety, and some departments provide magnetic decals for participant cars.

Is there any cost/benefit data on the use of volunteers?

Two factors have greatly influenced the cost/benefit ratio. Tickets issued a few years ago were often for \$20-\$50, but now have increased to \$200-\$300 to emphasize the severity of the infraction. And the shift from paid police parking enforcement staff to volunteers has been beneficial to police departments. Money from citations supports the extra costs of the volunteers – insurance, uniforms, vehicles, and so on – and may also be used by the cities to pay for other disability access costs.

What is the downside of using volunteers to enforce parking rules? How do cities deal with these issues?

Some cities reported that a few of their older volunteers were so inflexible that they were more harmful than helpful. Legal liabilities were a serious concern for some, as was union opposition. In some police departments the officers were resistant to working with the volunteers, and poor cooperation resulted in weak volunteer effectiveness. The most commonly cited concern was the angry citizen who felt the ticket was not justified. Less commonly, some volunteers have overstepped their authority and caused problems, e.g., trying to arrest an angry citizen who confronted him.

Actual liability issues seem to be infrequent, and cities can provide volunteer insurance that covers law enforcement activities for this and other law enforcement activities. The alternative is to have the volunteers provide insurance coverage and offer proof to the department. One Police Department in Michigan provides medical insurance, worker's compensation insurance and a stipend for gasoline.

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